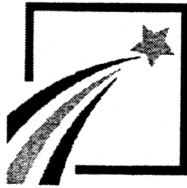


A03-0012



***National
Environmental
Achievement Track***

Application Form

Pfizer Global Manufacturing, Lititz PA

Name of facility

Pfizer, Inc

Name of parent company (if any)

400 West Lincoln Avenue

Street address

Street address (continued)

Lititz, PA 17543

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Charles Souders, P.E.

Manager, Compliance

Phone 717-627-9539

717-627-9837

E-mail charlie.souders@pfizer.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Consumer healthcare products including Listerine, Lubriderm, Caladryl, Benadryl and Neosporin and generic pharmaceutical products (Parke-Davis) are manufactured at this site.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2834

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☒ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

☒ Yes ☐ No

If yes, list in the right-hand column

PAD003008943
PAP120320
PAR233529
36-313-030F
36-313-068
36-3007
36-317-019A

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

See attached checklist

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.
☐ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Pfizer Lititz participates in numerous community environmental organizations/forums including Businesses for the Bay, the Susquehanna Valley Ozone Action Partnership, the Lititz Area Wellhead Protection Program Task Force, Pennsylvania Wildlife Federation and Lititz Run Watershed Alliance.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

- 1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|-----------------------------------|---|
| a. Environmental policy | <input checked="" type="checkbox"/> Yes |
| b. Planning | <input checked="" type="checkbox"/> Yes |
| c. Implementation and operation | <input checked="" type="checkbox"/> Yes |
| d. Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| e. Management review | <input checked="" type="checkbox"/> Yes |

- 2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

- 3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

- 4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
BOD Discharges to Water	508,080	pounds	153,191	pounds
<p>i. How is the current level an improvement over the previous level?</p> <p>The current level represents a 70% reduction in BOD discharges to the sewer. The average BOD level dropped from 859 mg/l in 1997 to 317 mg/l in 1999. In addition total waste water discharges dropped by 21%.</p> <p>ii. How did you achieve this improvement?</p> <p>BOD levels and total waste water discharges were reduced through (1) increased awareness regarding proper disposal of bulk product, (2) improved procedures regarding equipment cleaning and (3) equipment changes, i.e. installation of solenoid valves.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Release History	Quantity 3	Units reportable releases	Quantity 0	Units reportable releases
<p>i. How is the current level an improvement over the previous level?</p>				
<p>ii. How did you achieve this improvement?</p>				

2. Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? **Total Energy Use**
- b. Is this aspect identified as significant in your EMS? ☐ Yes ☒ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value **40,066,800 kwh (Quantity/Units)**
- ☐ Option B: In terms of units of production or output **(Quantity/Units)**

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 3,000,000 kwh
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

- 1) turn off equipment when not in use
- 2) install occupancy sensors
- 3) install energy efficient lighting
- 4) raise temperature settings to within allowable limits
- 5) improve boiler efficiency

Second aspect you've selected

a. What is the aspect?

Total Solid Waste

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 5,170 tons
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 259 tons
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

- 1) improvements in utilities, i.e. reduced boiler and chilled water downtime will reduce incidents which result in product waste
- 2) tank farm improvements will reduce raw material rejects

Third aspect you've selected

- | | | |
|---|---|--------------------------------|
| a. What is the aspect? | Total Hazardous Waste | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 1,862 tons
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 225 tons
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| e. How will you achieve this improvement? | 1) change from a flush-in-place procedure to clean-in-place for line cleaning and flavor changes in mouthwash production area | |

Fourth aspect you've selected

- | | | |
|---|---|------------------------------------|
| a. What is the aspect? | Wastewater Discharges/BOD Discharges | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 153,191 pounds
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 15,000 pounds
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| e. How will you achieve this improvement? | 1) Recovery of purified water
2) Recovery of steam condensate
3) Implementation of clean-in-place procedure | |

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

Section D

Tell us about your public outreach and reporting.

- 1 How do you identify and respond to community concerns?

Pfizer Lititz has a procedure for responding to communications received from external interested parties which involves reviewing, documenting and responding to relevant communications from external interested parties. In addition, Pfizer solicits and receives input from the community via participation in various community boards and forums.

- 2 How do you inform community members of important matters that affect them?

Pfizer holds public meetings, attends Lititz Borough council meetings and Flood Control Committee meetings, and holds one-on-one discussions with community representatives and local government officials.

- 3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☒ Newspaper

☐ Open Houses

☒ Other

On-Site Meetings

Off-Site Meetings

Future web site

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	1) Susquehanna Valley Ozone Action Partnership	Larry Downing	717-560-2533
	2) Lititz Run Watershed Alliance	Dan Zimmerman	717-626-8900
	3) Trout Unlimited	Greg Wilson	717-627-0419
<i>State/Local Regulator</i>	1) PA Department of Environmental Protection, Bureau of Air Quality	Jim Salvaggio	717-787-9702
	2) PA Department of Environmental Protection, Office of Pollution Prevention and Compliance Assistance	Edwin Pinero	717-783-9981
	3) Borough of Lititz	Sue Barry	717-626-2044
<i>Other community/local reference</i>	1) PA Chamber of Business and Industry	Sharon Roth	717-720-5462
	2) Lancaster County Conservation District	Don Robinson	717-394-0876
	3) Pennsylvania Wildlife Federation	Joan Clippinger	717-231-4390

Section E

Application and Participation Statement.

On behalf of Pfizer Global Manufacturing, Lititz PA
[my facility],

I certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date S. Timmis 9/27/00

Printed Name/Title Sharon Timmis, Vice President of Operations

Facility Name Pfizer Global Manufacturing, Lititz PA

Facility Street Address 400 West Lincoln Avenue
Lititz, PA 17543

Facility ID Numbers	PAD003008943	36-313-030F
	PAP120320	36-313-068
	PAR233529	36-3007
		36-317-019A

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements

Section A, 6

The attached document (Attachment #1 to our SOP Number ENV017) identifies all federal, state, tribal, and local environmental requirements applicable to the Pfizer Global Manufacturing Lititz facility.

Facility Name	Pfizer Global Manufacturing			
Facility Location:	400 West Lincoln Avenue, Lititz, PA 17543			
Facility ID Number(s):	PAD003008943	PAP120320	PAR233529	
<i>(attach additional sheets if necessary)</i>	36-313-030F	36-313-068	36-3007	36-317-019A

SOP NUMBER: ENV017

SOP VERSION: 2.0

SOP TITLE: Identification of Legal and Other Requirements

Attachment #1

HAZARDOUS WASTE			
Element	State Regulation	Federal Regulation	General Requirement
Hazardous Waste Emergency Planning	25 PA Code 262.34, 262.46	40 CFR 262.34(a)(4), 265.50-262.56	Written PPC plan or amended SPCC plan to incorporate haz. waste management. Plan is to be maintained onsite and submitted to local emergency planning services
Hazardous Waste Emergency Planning	25 PA Code 265.33	40 CFR 265.33	Requirements for the testing and maintenance of emergency equipment and maintenance of testing and inspection records
Hazardous Waste Training	25 PA Code 262.34, 265.16	40 CFR 262.34, 265.16	Written training plan and training records. Training records maintained for at least 3 years after employee leaves.
Hazardous Waste Spill/Discharge Reporting	25 PA Code 262.46		Immediately report to DEP spills to surface water/groundwater = or > the RQ. Written report to DEP within 15 days of incident.
Hazardous Waste Reporting	25 PA Code 262.12	40 CFR 262.12	Notification of EPA of hazardous waste activity prior to the transportation of waste offsite
Hazardous Waste Waste Storage	25 PA Code 262.34	40 CFR 262.34	Requirements for temporary storage and satellite accumulation points
Hazardous Waste Waste Storage	25 PA Code 262.34	40 CFR 262.34	Procedure required to ensure that building is emptied every 90 days.
Hazardous Waste Waste Storage	25 PA Code 265.171 - .178, 37 PA Code 11, 13	40 CFR 265.171 - .178	Use and management of containers
Hazardous Waste Waste Storage	25 PA Code 265.190 - .198	40 CFR 265.190 - .198	Requirements for tanks which store hazardous waste
Hazardous Waste Reporting	25 PA Code 262.41	40 CFR 264.75	Hazardous waste biennial report to DEP 3/1 of each even numbered year.
Hazardous Waste Planning	25 PA Code 262.80	40 CFR 262.41 (a) (b) (c)	Source reduction strategy by 1/17/94 reporting activities over previous 5 years, maintained onsite and updated every 5 years
Hazardous Waste Waste Storage	25 PA Code 265 Subpart J	40 CFR 265 Subpart J	Hazardous waste storage tank management requirements

SOP STATUS: Effective

EFFECTIVE DATE: 09/07/2000 12:00:00 AM

Template Plug-In Version 2.1

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SOP VERSION: 2.0

SOP TITLE: Identification of Legal and Other Requirements

Attachment #1

HAZARDOUS SUBSTANCES			
Element	State Regulation	Federal Regulation	General Requirement
Hazardous Substances Communication	35 P.S. 7303(e) 34 PA 303.1(d)		Hazardous Substance Survey Form completed for hazardous substances present during the previous year, updated annually and provided to employees upon request.
Hazardous Substances Communication	35 P.S. 7303(g) 34 PA Code 303.2, 303.5(a)(b)		Environmental Hazards Survey provided to Dept. Labor and Industry within 30 days, if requested.
Hazardous Substances Communication	35 P.S. 7304(b)(3), 7305(b)(e) 34 PA Code 307.10(a), 307.11(b), 307.13	SARA 311(a) 29 CFR 1910.1200(g)	MSDS needs to be present for each hazardous substance present in the work place - available to Emergency Planning Committee upon request.
Hazardous Substance Communication		29 CFR 1910.1200 (e)(2)	Develop, implement and maintain written hazard communication program to inform employees of hazardous substances.
Hazardous Substances Communication	35 P.S. 7307 (a) 34 PA Code 313.2		List of hazardous substances needs to be posted in the work place, associated hazards and rights under Right-To-Know.

SOP STATUS: Effective

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SOP TITLE: Identification of Legal and Other Requirements

Attachment #1

WASTE WATER			
Element	State Regulation	Federal Regulation	General Requirement
Waste Water Notification		40 CFR 122.26(a)(4)	Notify POTW of discharges of storm water 180 days prior to commencing the discharge.
Waste Water Notification		40 CFR 403.6(b)	POTW notified of discharge 90 days prior to the date of start up.
Waste Water Notification		40 CFR 403.12(g)(2)	Notification within 24 hours of pretreatment violation-repeat analysis within 30 days.
Waste Water Notification		40 CFR 403.12(p)	POTW notified in advance of any changes to the volume or pollutants in the discharge.
Waste Water Permitting		40 CFR 403.6(a)	Categorical determination request 60 days after the effective date of a pre-treatment standard applicable to the facility.
Waste Water Permitting		40 CFR 122.21	All discharge points at the plant should be identified - location of sanitary, industrial and storm water runoff discharges should be located on a base map.
Waste Water Permitting		40 CFR 439 Subpart I	Federal pharmaceutical pretreatment standards.
Waste Water Monitoring		40 CFR 403.12(o)	Maintain records of monitoring activities for a minimum of 3 years.
Waste Water Monitoring		40 CFR 403.12(g)	Monitoring and analysis required to demonstrate compliance with pretreatment standards. Monthly measurements of flow and pH. Semiannual sampling for CN.
Waste Water Reporting		40 CFR 403.12(c)(3)	Discharge monitoring reports due June/December each year.
Waste Water Reporting		40 CFR 403.12(b)	Baseline report regarding current facility operations and discharges.
Waste Water Reporting		40 CFR 403.12(d)	Compliance report submitted 90 days after the facility has demonstrated compliance with the categorical standard.
Waste Water Reporting-Lititz Borough Ordinance			Lititz Borough Quarterly Waste Water Discharge Reports. Lititz Code - Chapter 100

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SOP VERSION: 2.0

SOP TITLE: Identification of Legal and Other Requirements

Attachment #1

AIR QUALITY			
Element	State Regulation	Federal Regulation	General Requirement
Air Quality	25 PA Code 123.1, 123.2, 123.11, 123.13, 123.21, 123.22, 123.31, 123.41		Prohibition or restrictions on the emissions of fugitive air contaminants, particulate matter, sulfur compounds, malodorous and visible air contaminants to the outdoor atmosphere. Also limits on emissions from specific sources.
Air Quality	124.1-124.3	40 CFR 61	NESHAPS
Air Quality	25 PA Code 127.1		General requirements for construction, modification, reactivation and operation of new sources of air contaminants.
Air Quality	25 PA Code 127.11, 127.14		Plan approval requirements for construction and/or modification of air contaminant sources or reactivation of sources out of service longer than 1 year. Certain sources are exempted.
Air Quality	25 PA Code 127.43-127.51		Notification requirements under the plan approval process.
Air Quality	25 PA Code 127.81-127.83		Emission reduction planning in accordance with Prevention of Significant Determination Requirements.
Air Quality	25 PA Code 127.401-464		Operating permit requirements.
Air Quality	25 PA Code 127.501-127.543		Operating permit program requirements applicable to Title V facilities.
Air Quality		40CFR 63	NESHAP for pharmaceutical.
Air Quality		40CFR 82	CFC Management
Air Quality	25 PA Code 127.601-127.641		Plan approvals and operating permits.
Air Quality	25 PA Code 127.701-127.707		Plan approval and operating permit fees.
Air Quality	25 PA Code 129.51		General requirements for controlling and limiting emissions of VOCs. Data required to determine compliance or exemption needs to be maintained for a minimum of 2 years.
Air Quality	25 PA Code 129.57		Requirements for storage tanks less than or equal to 40,000 gallons storing VOCs.

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SOP VERSION: 2.0

SOP TITLE: Identification of Legal and Other Requirements

Attachment #1

RESIDUAL/MUNICIPAL WASTE			
Element	State Regulation	Federal Regulation	General Requirement
Residual Waste Reporting	25 PA Code 287.52		Biennial report due 3/1 of each odd numbered year - Form 330.
Residual Waste Reporting	25 PA Code 287.53		Source reduction strategy describing activities 5 years prior to 7/4/92 then updated every 5 years - Form 25R.
Residual Waste Reporting	25 PA Code 287.54		Waste analysis and characterization required for generators who generated more than 2,200 pounds total residual waste in any calendar month - Form 26R.
Municipal Waste Reporting	Borough of Lititz Ordinance C-35, Act 101		Annual report of recycling activities.
Residual Waste	25 PA Code 271.601-271.613		
Infectious Waste	25 PA Code 285.131,.132,.148,.221-224		Rules regarding collection and storage of infectious waste.

SOP STATUS: Effective

EFFECTIVE DATE: 09/07/2000 12:00:00 AM

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